

## **NOAA INSTRUCTIONS FOR SUBMITTING A PRA CLEARANCE REQUEST TO OMB**

The following are the instructions for NOAA offices for requesting Paperwork Reduction Act clearance from OMB. A fillable PDF version of the required OMB-83I form is available from this site as well as the Word version of the supporting statement template.

### **INSTRUCTIONS FOR MAKING A PAPERWORK REDUCTION ACT CLEARANCE SUBMISSION (OMB 83-I AND SUPPORTING STATEMENT)**

The OMB form 83-I, supporting statement, forms and other support documents are to be used to request OMB Paperwork Reduction Act clearance for information collections affecting the public. The sponsor of the request for clearance submits the request electronically to the Line Office (LO) coordinator to initiate the formal clearance process, carbon copying the NOAA PRA Clearance Officer. If the sponsor's program is not within a line office, the submission is sent directly to the NOAA PRA Clearance Officer.

The NOAA PRA Clearance Officer will pre-review the submission and contact the sponsor with questions and suggested edits. The Clearance Officer will send the LO Coordinator revised drafts of the 83-I and supporting statement after completion of edits agreed upon with the sponsor. The LO Coordinator will then review the submission, obtain the appropriate LO signature, and send the formal package to the NOAA Clearance Officer. The Clearance Officer will conduct a brief review, sign, and forward the package to the Department of Commerce PRA Clearance Officer.

The submission contains all of the following:

- 1) A completed OMB 83-I (*an office director or deputy signs and both an electronic and a hard copy must be submitted – see #19, Certification*).
- 2) A complete supporting statement as described below
- 3) Copies of any forms, questionnaires, interview guides, etc., used in the collection
- 4) A copy of the law or Executive Order which authorizes either the collection itself or the program the collection will support
- 5) A copy of the published Federal Register notice soliciting public comment on the information collection (not required with submissions involving a Notice of Proposed Rulemaking)

6) The proposed regulation if the collection is contained in rulemaking.

7) For NMFS only, fillable copies of the forms in pdf format. This requires the full version of Adobe Acrobat (writer and reader functions). If you are unable to make your forms fillable, please contact the NMFS HQ forms coordinator, Pat Hansford: [pat.hansford@noaa.gov](mailto:pat.hansford@noaa.gov).

Please include with your submission a completed checklist of the applicable items listed above.

**INSTRUCTIONS FOR THE OMB 83-I (Note: you may find it easier to complete the supporting statement first and then transfer applicable information to the 83-I. ):**

**1. Agency/Subagency originating request** - Enter DOC/NOAA, then the name of your line or staff office.

**2. OMB control number** -If the information collection has previously been approved by OMB, enter the control number that was assigned (whether current or expired). For NOAA, it will always start with "0648" and have 4 additional digits. Check "b" for "None" for new collections which never been assigned such a number.

**3. Type of information collection** - Check only one block.

a. Check "New Collection" when the collection has not previously been used by NOAA.

b. Check "Revision" when the collection has previously been approved by OMB and you wish to make a change in the questions asked, the manner of the collection, the burden estimate, or the way in which the information will be used. *A revision is usually related to a rule or a change in the regulations.*

c. Check "Extension" when the collection currently has OMB approval, you wish to extend that approval past the current OMB expiration date (generally, renew for another 3 years), and no major or rule/reg-related change is proposed for the collection.

d. Check "Reinstatement, without change" when you are submitting a collection which previously had OMB approval, the approval expired, and no change has been made in the previously approved collection.

e. Check "Reinstatement, with change" when the collection is like "d" above, but has been changed since the prior approval.

f. Check "Existing collection" if the collection has been in use without ever having received OMB approval. If you check this block, your request should be accompanied by a memo explaining why this violation of the Paperwork Reduction Act took place.

**4. Type of review requested** - Block "a", "Regular Submission", should always be checked unless instructed otherwise by the NOAA PRA Clearance Officer. If you have a situation that requires OMB approval in less than 60 days in order to avoid some damaging effect upon the public or the environment, call the NOAA PRA Clearance Officer or your line office PRA Coordinator to discuss the situation. Embarrassment from not meeting a deadline because of lack of foresight is not regarded as an emergency by NOAA or DOC.

**5. Small Entities** - Indicate whether this information collection will have a significant impact upon a substantial number of small entities. A small entity may be (1) a small business that is independently owned and operated and that is not dominant in its field of operations; (2) a small organization that is any not-for-profit enterprise independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

**6. Requested expiration date** - Check block "a" for 3 year approval unless you know that the collection's life will be less than 3 years. In the latter case, check block "b" and enter a date. DO NOT request an expiration date beyond 3 years, as OMB is prohibited by law from giving such an approval. If the action is a revision to a currently approved collection, and the Supporting Statement addresses only the revised requirements and not all of the previously approved requirements (e.g. not a combination of revision with renewal), enter the existing expiration date for the collection.

**7. Title** - Provide a title for the information collection. If the submission is a revision to a currently approved collection, or what is called a "family of forms", use the title for the overall collection rather than providing the title of the change to take place. Usually you should not use the title of any associated rulemaking, as it will not specifically identify the information collection itself.

**8. Agency form numbers** - Enter the numbers of any NOAA- or DOC-numbered forms to be used in the collection. When multiple forms will be used, separate the numbers with commas. *If the only number on the form is the OMB Control Number, do not list it here.*

**9. Keywords** - Leave blank. These will be filled in by the NOAA Clearance Officer.

**10. Abstract** - Provide a statement, limited to 5 lines of text, describing the need for the information, how it will be used, and the respondents (e.g. "coral fishermen").

**11. Affected public** - Mark all the categories that apply. Mark the primary respondent group with a "P".

**12. Obligation to respond -**

- a. Check "Voluntary" when the response is entirely discretionary and has no direct effect on any benefit or privilege for the respondent.
- b. Check "Required" when response is elective, but is required to obtain or retain a benefit (e.g. a loan).
- c. Check "Mandatory" when the respondent must respond by statute or regulation.

**13. Annual recordkeeping and reporting burden** - Enter the information described below. If you are requesting approval for 3 years, and the number of respondents, responses and/or burden hours will vary significantly during that period, provide an annual average over the period rather than the maximum year's figures.

If the submission is a revision to an existing collection, the numbers should reflect the new totals for the overall collection, and not just the changes being made. That is, if you are adding six respondents, 100 responses, and 25 burden hours per year, these are not your new annual totals; the new totals reflect the current numbers plus the added numbers (e.g. current hours of 500 plus added 25 hours equals 525).

**If you do not have accurate data on the totals, contact the NOAA PRA Clearance Officer or check the current totals for this collection at:**

<http://www.cio.noaa.gov/itmanagement/prastat.htm> (click on first bullet on this page). OMB updates the totals monthly. Some reasons why the totals may have changed since the last renewal: a revision, submitted through this same process, and/or a change worksheet that may have merged another collection into this one. *If you are not a new sponsor for this collection, you will have been the one doing the revising and/or merging, but it still never hurts to check your totals!*

a. Enter the total number of respondents, annualized over the 3-year approval period. That is, if each respondent responds at least once per year, do not divide by 3 – your annual respondent total is the same as your overall total. If each respondent responds less often than annually in the three-year period, divide the total by 3.

Do not double count respondents: if 15 people file 3 reports per year, you have 15 respondents and not 45.

b. Enter the total number of responses provided annually. Recordkeeping should be treated as 1 response per year.

b1. Provide the percentage of responses that will be submitted/collected using electronic media (other than telephones and facsimile submissions). Do not include the entering of submitted information into a computer after receipt in NOAA. *Note: even in the best of scenarios, with all respondents having easy internet access, and all your forms being completed on line, you would not state "100 %", as this would imply that should a respondent NOT be able to use electronic means, there would not be an alternative available. The **exception** would be responses through a vessel monitoring system, if this is the only type of response in the collection.*

c. Enter the total annual reporting and recordkeeping burden in hours.

d. Enter the total annual burden hours currently approved by OMB. Enter "0" for a new collection or a collection for which OMB approval expired.

e. Enter the result from subtracting line d from line c. Record a negative number in parentheses.

f. If line e shows anything but a "0", the difference between lines c and d must be explained. A "program change" is the result of deliberate government action (e.g. adding more questions to a form). All new collections are program changes. "Adjustments" are

changes that were not the result of deliberate government action or not under government control, such as an increase in the number of fishers in a fishery required to fill out a form. Mistakes in previous calculations, a higher number of applicants for a permit than estimated, and similar events are adjustments. If appropriate, both program changes and adjustments can be used to explain a burden hour change.

**14. Annual reporting and recordkeeping cost burden** - The costs identified in this item must exclude costs associated with the burden hours identified in Item 13 of this form - use the costs identified in #13 of the Supporting Statement, i.e. recordkeeping/reporting costs, NOT labor costs (labor costs are addressed ONLY in the supporting statement #12, and do not appear on the 83-I)..

a. Enter the total dollar amount of annualized costs for all respondents of any associated capital or start-up costs (e.g., the cost of buying and setting up a computer needed to make the reports, divided by 3 years).

b. Enter recurring annual dollar amount of costs for all respondents associated with operating or maintaining systems or purchasing services. Include any money the respondent spends to comply with the information request/requirement (e.g. for attorney fees).

c. Enter total of 14a + 14b as annual reporting and recordkeeping cost burden.

d. Enter any cost burden currently approved by OMB for this collection of information. Enter zero (0) if this is a new submission.

e. Enter the difference by subtracting line d from line c. Record a negative number within parentheses.

f. Explain the difference. The difference in line e must be accounted for in lines f1 and/or f2.

f1. "Program change" is the result of deliberate Federal government action. All new collections and any subsequent revisions or changes resulting in cost changes are recorded as program changes.

f2. "Adjustment" is a change that is not the result of a deliberate Federal government action. Changes resulting from new estimations or actions not controllable by the Federal government are recorded as adjustments.

**15. Purpose of information collection** - Self-explanatory.

**16. Frequency of recordkeeping or reporting**

a. Check "Recordkeeping" if the collection of information explicitly requires persons to maintain records that will not subsequently be submitted to the Federal government.

- b. Check "Third party disclosure" if a collection of information requires a person to obtain or compile information for the purpose of disclosure to members of the public or the public at large, through posting, notification, labeling, or similar requirements.
- c. Check "Reporting" for information collections that involve reporting to the Federal government and check the frequency of reporting that is requested or required of a respondent. If the reporting is triggered by an event, check "On occasion".

## **17. Statistical methods**

Many research collections and scientific program evaluations employ statistical methods, while applications and audits do not.

Check "Yes" if you are:

Collecting data using any survey methods.

*Note: OMB is now including census (collection from the entire respondent population) under "sampling", and since sampling is a statistical method, any information collection referred to as a "survey" you must check "yes" and complete Part B of the supporting statement (see below).*

Doing any kind of estimation, imputation, or weighting.

Pretesting or field testing for a survey, including cognitive interviews or focus groups from a total of 10 or more people.

If you check "yes" you must also answer Part B in the Supporting Statement (*see Part B instructions at the end of this document*).

**18. Agency contact** - Provide the name and telephone number of someone able to answer questions regarding the content of the submission.

**19. Certification** - DO NOT SIGN THIS BLOCK! No entry is needed. You do need to review the certification standards, and if the collection fails to meet one or more of those standards Item 18 of the Supporting Statement must explain the reason for that failure.

**Agency Certification** - The Department requires that the OMB 83-I be signed by an Assistant Administrator or head of the Management and Budget Staff for Line Office submissions, or by the Director of a Program or Staff Office if not being submitted through a line office.

## **INSTRUCTIONS FOR THE SUPPORTING STATEMENT:**

**GENERAL INSTRUCTIONS** -Each request for OMB approval of an information collection must include a Supporting Statement prepared in the format described below. The quality of the Supporting Statement is a key factor in whether approval is obtained. If an item is not applicable, provide a brief explanation. All Statements must respond to the items in Section A; if Section B does not apply, state that the collection will not

employ statistical methods. If Item 17 of the OMB 83-I was checked "Yes", then Section B must be completed. Electronic formats for the Supporting Statement are available at "[www.rdc.noaa.gov/~pra/83i.htm](http://www.rdc.noaa.gov/~pra/83i.htm)".

Attach copies of any forms or other instruments used to obtain the information from the public. Collection forms must display the required public notification information described in Preambles, under PRA Guidance.

Your Supporting Statement should repeat the underlined portions of each item below. These are already provided on the electronic format available on this site.

## **SPECIFIC INSTRUCTIONS -**

### **SECTION A. JUSTIFICATION:**

#### **1. Explain the circumstances that make the collection of information necessary.**

Include a citation and brief description of any statute or executive order that requires the collection, as well as any regulations on which revisions are based, if applicable. Copies of statutes mandating or authorizing a collection must be included with all a submissions. Provide some background information on the program and describe how the collection supports it. Detail any specific program problems you hope to resolve.

If NOAA is already collecting information from the same universe of respondents, briefly describe these collections and how they relate to the proposed collection. Every practical effort should be made to consolidate requirements on the same respondents, and the Supporting Statement should reflect that this has been done. If collections have very similar questions, you may wish to describe the relationship in Item 4, rather than in Item 1.

#### **2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.**

For all but "New" collection requests, indicate the actual use NOAA has made of the information received. This explanation of the proposed and any past use of the information is a key one and must be detailed. *Do not just make general statements about the overall use of the information, but address the specific items of information being collected. You should deal individually with each question or type of question being asked in your survey or on your form unless the purpose of the question is obvious to someone not familiar with your program.* One of OMB's key standards under the Paperwork Reduction Act is whether the information has "practical utility"; you must demonstrate that you will be using all of the information collected for a practical and necessary program purpose.

In response to Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554), NOAA has issued guidelines for ensuring and maximizing the quality, objectivity, utility, and integrity of information disseminated by NOAA; and established administrative mechanisms allowing affected persons to seek and obtain correction of information that does not comply with applicable guidelines.

As a result of the Section 515 requirements and resulting guidelines, you need to do the following: (1) become familiar with the NOAA Information Quality Guidelines and determine whether they could apply to your collection; and (2) if they do apply (e.g. the information collected will be disseminated to the public or used to support information that will be disseminated to the public), explain at the end of #2 how the information collected complies with applicable Information Quality Guidelines.

The following statement would be applicable when the Guidelines do apply:

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. As explained in the preceding paragraphs, the information gathered has utility. NOAA (*insert line office or program name*) will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response #10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554.

If you do not plan to disseminate the information, or use it to support information that will be disseminated, explicitly state this in the answer:

As explained in the preceding paragraphs, the information gathered has utility. NOAA Fisheries will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response #10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should NOAA (*insert line office*) decide to disseminate the information, it will be subject to the quality control measures and pre-dissemination review pursuant to Section 515 of Public Law 106-554.

If the collection involves *vessel or gear marking only*, state simply that “The information collected will not be disseminated to the public, as it consists solely of marking gear



and/or vessels with the appropriate vessel or permit number. This information is not submitted to NMFS.”

You should always address the quality of information guidelines per one of the three scenarios above. It is critical that your collection complies with the Guidelines if they are applicable, since failure to do so can open Fishery Management Plans and other actions to legal challenge.

Finally, OMB has [standards](#) for asking questions about race or ethnicity. If you ask such questions, you must comply with those standards.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

Explain the basis for the decision for adopting this means of collection. Also describe any consideration you have given or are giving to the use of improved information technology to reduce the burden on the public. You must address the following:

- a. Is the electronic submission of responses allowed\*
- b. If a form is involved, is it available for public printing off the Internet\*
- c. Will the results of the information collection be made available to the public over the Internet?

If the answer to any of those questions is “no”, are there plans to do so? Why not? *Note: even in the best of scenarios, with all respondents having easy internet access, and all your forms being fillable on line, you would not state on the 83-I, #13(b)1, “100 %”, as this would imply that should a respondent NOT be able to use electronic means, there would not be an alternative available.*

A separate aspect of the question is your use of technology. This is of particular concern in the case of interviews. Will your interviewers use laptops or other computers to directly enter the answers being provided? If not, why not?

**4. Describe efforts to identify duplication.**

Describe your efforts to identify duplication with other collections which may be gathering the same or similar information. If the same or similar information is available, describe why it cannot be used or modified for the purposes described in "2" above.

**5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.**

If the collection will have a significant impact on small entities such as small businesses, organizations, or government bodies (see the instruction above for Item

5 of the OMB 83-I), describe the methods used to minimize the burden on them.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

Address both parts of the question: not conducting the collection AND doing it less frequently. Generally one or two paragraphs is sufficient.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

See Attachment 1 and explain the need for any inconsistencies in your collection.

**\* All NMFS forms must be made available to the public as “fillable and printable” in the NMFS forms portal. Therefore, unless another electronic means such as an online web affiliation is available, you must respond that the forms and related instructions are available to the public on the Internet and can be completed online and printed.**

**8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

Specifically address comments received on the estimated cost and hour burden. If you are submitting the request in association with a Notice of Proposed Rulemaking, state that comment is being solicited in the proposed rule.

Re “Describe your efforts . . .”, *consultation with representatives of those being affected should occur at least once every three years, even if the collection has not changed.* If circumstances prevent this consultation, describe them, but please note that OMB is emphasizing the need for such consultations. Do not list consultations done more than 3 years ago.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

OMB is generally opposed to payments or gifts for information submissions, so if you are proposing to do so provide a good justification for it.

**10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.**

You must cite a specific authority for promising confidentiality.

1. For many NMFS PRAs, section 402(b) of the Magnuson-Stevens Act (16 U.S.C. 1801, *et seq.*) may apply: <http://www.nmfs.noaa.gov/sfa/magact/mag4.html#s402>

2. If the Privacy Act (5 USC 552a) applies to a collection, it can be used as a statutory authority for confidentiality: <http://www.privacy.gov.au/act/privacyact/>. If there is another appropriate statutory authority in addition to the privacy act, it is best to cite that authority. However, if the Privacy Act applies, compliance is still necessary (see below).

This Act generally applies if the information collected will be stored, and retrievable by, identifiable individual. This Act, as described in an OMB PRA training, “governs the collection, maintenance, disclosure of information from or about identifiable individuals (not statistical or aggregate information).” *For these purposes, corporations are NOT considered to be individuals, but persons acting as or for corporations are still considered individuals.*

If an information collection falls under this Act, a “system of records” must be published in the Federal Register, which describes how and where the information is stored, and how it is secured. . If a system of records already exists under which this collection would fall, then you do not need to go through this process. For instance, NOAA has a general fishery statistics system of records, NMFS Alaska Region has a permits system of records, and the NMFS Northwest Region’s permits system of records is pending DOC approval..

A summary of the information in the system of records description – a Privacy Act Statement - must be posted on each form related to the collection.

The [NOAA Privacy Act homepage](#) provides links to tutorials and instructions related to the Act, as well as a list of NOAA systems of records (which, however, may not be current). The NOAA PRA Clearance Officer can work with you to determine the applicability of the Privacy Act, and how to make your collection compliant if it is determined to be applicable.

If you request a respondent’s social security number, this Privacy Act note (Section 7(a)(1) applies: *Any Federal, State or local government agency which requests an individual to disclose his social security account number shall inform that individual whether that disclosure is mandatory or voluntary, by what statutory or other authority such number is solicited, and what uses will be made of it.*

You must also cite the statutory authority for requiring the SSN. Generally, this will be the Debt Collection Improvement Act, 31 U.S.C. 7701(c)(1), which provides that: “the head of each Federal agency shall require each person doing business with that agency to furnish that agency such person’s taxpayer identification number (*usually the SSN*). Further, at 31 U.S.C. 7701 (c)(2)(B): “For purposes of the subsection, a person shall be considered doing business with a Federal agency if the person is an applicant for, or

recipient of, a Federal license, permit, right of way, grant or benefit payment administered by the agency....”

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

The justification should include the reasons why the questions are necessary, the specific uses for the information, the explanation to be given to the respondents, and any steps taken to obtain their consent.

*Note on the following two questions: You may present burden hour and cost estimates from Items 12 and 13 in a single table, making sure to separate “labor costs” from 12 and “recordkeeping and reporting” costs from 13 into separate, clearly labeled columns! See the sample table format, with two types of types of response that might be found in a NMFS collection. The hour and dollar amounts are examples only, not necessarily accurate for your purposes.*

**12. Provide an estimate in hours of the burden of the collection of information.**

This question corresponds most closely to #13 on the 83-I but also asks for the labor cost per burden hour.

Although this submission may be a revision to an approved collection, and thus describes only the new or changed requirements in Question 2, this answer should state the total new burden hours and how much this figure is increased/decreased from the previous burden (if any) for the requirement.

- a. The statement must provide the number of respondents expected annually, the frequency of their responses, the total number of responses expected, the average response time per respondent, and the total annual response time (in hours) for the collection. Response time includes not only the time necessary to complete the form or answer the questions, but also the time needed to gather the information (unless it was already being gathered for other purposes), have it reviewed by lawyers or accountants, etc. Explain how you arrived at these estimates.
- b. Remember that figures should be annualized. For example, if a permit will be valid for three years, and you expect 300 respondents the first year and none the second and third years, use the average of 100 respondents. If the burden per response is expected to vary widely, show the expected range of responses and explain the variance.
- c. If the collection will involve more than one form, provide burden estimates for each form.
- d. Provide estimates of annualized labor cost to respondents for the hour burden for the collection, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for the collecting the information should not be included here (see Item 14 below).

**13. Provide an estimate of the total annual recordkeeping/reporting cost burden to the respondents resulting from the collection (excluding the value of the burden hours in #12 above).**

This bears repeating - do NOT include the labor cost (wage equivalent) of the burden hours described in Question 12 (above). The information required here corresponds to that in #14 on the 83-I.

The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. The total figure should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life), *if applicable*; and (b) a total operations, maintenance, and purchase of services components.

a. Capital and start-up costs, averaged over the three-year collection period, include among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.

(1) If cost estimates are expected to vary widely (e.g. based on choice of equipment vendor), present ranges of cost burden and explain the reasons for the variance, but in your final figures use the highest estimate.

(2) Generally, estimates should *not* include purchases of equipment or services, or portions thereof, made: (a) to achieve regulatory compliance with requirements *not associated with the information collection*, (b) for reasons other than to provide information or keep records for the government, or (c) as part of customary and usual business of private practices.

b. Operations and maintenance costs include the costs of mailing, faxing or calling in information, making paper copies, and electronic transmission from vessel monitoring systems. Paint and brushes for vessel and gear marking would also fall under this category. Regular maintenance of any equipment whose initial costs fall under “capital and start-up” would also belong here.

**14. Provide estimates of annualized cost to the Federal government.**

Include here a description of the method used to estimate costs to the Federal government, which should show the quantification of hours, operational expenses (such as equipment, overhead, printing, and staff support), and any other expense which would not have been incurred without this collection of information.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.**

Program changes are new collections or changes in requirements. Adjustments are re-estimates of the number of respondents, responses and/or the response times for *existing* requirements. Please be more specific than, e.g. “Changes were due to the requirement that \_\_\_\_”). List at least net changes and the specific reasons for them, e.g. “Increased reporting/recordkeeping costs are due to the capital costs of vessel monitoring systems”.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

Address any complex analytical techniques that will be used.

Provide a time schedule for the collection, publication, and other actions. Also, will the results of the collection be made available on your organization’s Home Pages? If not, why not?

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

Self-explanatory.

**18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.**

Self-explanatory. There are virtually never exceptions.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

*If your collection does not employ statistical methods, just say that and delete the following five questions from the format –UNLESS your proposed information collection is a survey. OMB has recently clarified that Part B must be completed for all survey requests, whether or not statistical analysis will be applied. In addition to statistical analysis, Part B addresses the description of the target group of respondents, the sampling plan, and plans to maximize response rates and address non-response.*

When Item 17 of the OMB 83-I is checked "Yes", the following documentation should be provided to the extent that it applies to the methods proposed. *Click on this link to the applicable section of a 3-05 OMB PRA training.*

**1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g. establishments, State and local governmental units,**

**households, or persons) in the universe and the corresponding sample are to be provided in tabular form. The tabulation must also include expected response rates for the collection as a whole. If the collection has been conducted before, provide the actual response rate achieved.**

Note: response rate means: Of those in your respondent sample, from what percentage do you expect to get the required information (if this is not a mandatory collection). The nonrespondents would include those you could not contact, as well as those you contacted but who refused to give the information.

**.Describe the procedures for the collection, including: the statistical methodology for stratification and sample selection; the estimation procedure; the degree of accuracy needed for the purpose described in the justification; any unusual problems requiring specialized sampling procedures; and any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

If you are selecting a uniform respondent universe, you may be using simply a random numbers table to select a sample.

- Stratified sampling is often used when the sampling population can be split into non-overlapping strata that individually are more homogeneous than the population as a whole (e.g. gender and age groups). If there are no obvious "dividing lines", grid lines can be used to divide the population. Random samples are taken from each stratum (or class) and the results are combined to estimate a population mean. Stratified sampling is most successful when the variance within each stratum is less than the overall variance of the population (Christopher and Schmitt, Environmental Monitoring and Sampling Primer, 1997: <http://ewr.cee.vt.edu/environmental/teach/smprimer/design/sample.html#stratified>).

**3. Describe the methods used to maximize response rates and to deal with nonresponse. The accuracy and reliability of the information collected must be shown to be adequate for the intended uses. For collections based on sampling, a special justification must be provided if they will not yield "reliable" data that can be generalized to the universe studied.**

Any aspect of your plan which makes it easier and more attractive to comply with the request for information, would tend to maximize response rate:

- This would include such steps as pre-notification and various types of follow-up with those who did not respond at the first opportunity.
- Making the questions as simple and brief as possible is also important.
- Already having a good working relationship with this group would also be important, as would the group's perception that actions based on the information

collected would be helpful to them.

A lower response rate than 75% would definitely require a plan to address nonresponse, according to OMB's standards. This means that a large enough number of respondents didn't give information so that there is a possibility that their answers as a group might have differed significantly from those who did respond. Following up with nonrespondents – resending surveys or sending a shorter version of the survey, trying a phone interview if possible, etc. are all effective strategies.

**4. Describe any tests of procedures or methods to be undertaken. Tests are encouraged as effective means to refine collections, but if ten or more test respondents are involved OMB must give prior approval under the Paperwork Reduction Act.**

Pilot surveys of 10 or more are often conducted, and must go through the PRA approval process.

**5. Provide the name and telephone number of individuals consulted on the statistical aspects of the design, and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**

Self-explanatory.

## ATTACHMENT 1: OMB GUIDELINES FOR INFORMATION COLLECTIONS

OMB has issued the following guidelines for proposed information collections or requirements. If the proposed collection or requirement does not comply with the guidelines, the clearance request must contain an explanation of why the deviation is necessary. An information collection or requirement should:

1. Not require respondents to report information more often than quarterly.
2. Not require respondents to prepare a written response in fewer than thirty days after they receive the request.
3. Not require respondents to submit more than an original and two copies of any document.
4. Not require respondents to retain records for more than three years unless those records are health, medical, government contract, grant-in-aid, or tax records.



5. Not be a statistical study which is not designed to produce valid and reliable results than can be generalized to the universe of study. In other words, if you collect information from part of a group for statistical reasons, the results must be applicable to all of the group.

6. Not require the use of a statistical data classification that has not been reviewed and approved by OMB.

7. Not include a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

8. Not require respondents to submit proprietary, trade secret, or other confidential information unless the agency can demonstrate that it has instituted (and not just planned) procedures to protect its confidentiality to the extent permitted by law.